

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A PLACE FOR MOM, INC., a Delaware Corporation,  
  
Plaintiff,  
  
v.  
  
DANNY LEONHARDT, an individual, and  
CARE CHANGES, INC., a North Carolina corporation,  
  
Defendants.

NO. CV 06-0457 MJP

**JOINT REQUEST TO FILE  
EXHIBIT C TO LEONHARDT  
DECLARATION UNDER SEAL AND  
PROPOSED ORDER**

THE PARTIES, by their undersigned counsel, hereby request the Court's permission to file Exhibit C to the Declaration of Danny Leonhardt (filed 05/22/06 in support of Defendants' Memorandum in Opposition to Plaintiff's Motion for Preliminary Injunction) under seal for reasons as stated in Plaintiff's Response to Order Showing Cause for Filing Sealed Document (Court Docket No. 14). The exhibit is the commission plan that was given to Mr. Leonhardt during the first portion of his employment with Plaintiff, A Place For Mom, Inc. This request is made solely to accommodate A Place For Mom, Inc.'s concern regarding confidentiality, and is without prejudice to any of Defendants' defenses or claims, including

1 the position that Defendant, Danny Leonhardt, was not privy to any confidential information  
2 that would give him unfair advantage over Plaintiff, A Place For Mom, Inc.

3  
4 DATED this 9<sup>th</sup> day of June, 2006.

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7 /s/ Sarah E. Nagae

/s/ Regina V. Culbert

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Attorneys for Defendants

13  
14 ORDER

15 The above stipulation is approved. The Court Clerk is hereby directed to accept the  
16 filing of the above-described exhibit Under Seal.

17 IT IS SO ORDERED THIS 13<sup>th</sup> day of June, 2006.

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20 /s Marsha J. Pechman  
21 HON. MARSHA J. PECHMAN  
22 UNITED STATES DISTRICT JUDGE  
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